

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
-v.- :
:
CHARLES WILLIAMS ONUS, :
a/k/a "CaHouse," :
:
Defendant. :
:
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SEALED INDICTMENT

19 Cr. 19 CRIM 346

COUNT ONE

(Computer Fraud - Causing Damage to a Protected Computer)

The Grand Jury charges:

OVERVIEW

1. From at least in or about July 2017 through at least in or about 2018, CHARLES WILLIAMS ONUS, a/k/a "CaHouse," the defendant, a national of the Federal Republic of Nigeria, participated in a scheme to conduct cyber intrusions of multiple user accounts maintained by a company that provides human resources and payroll services to employers across the United States (the "Company"), in order to steal payroll deposits processed by the Company.

2. During the course of the scheme, unauthorized access was obtained to over 5,500 Company user accounts through a cyber intrusion technique referred to as "credential stuffing." During a credential stuffing attack, a cyber threat actor

collects stolen credentials, or username and password pairs, obtained from other large-scale data breaches of other companies. The threat actor then systematically attempts to use those stolen credentials to obtain unauthorized access to accounts held by the same user with other companies and providers, to compromise accounts where the user has maintained the same password.

3. After CHARLES WILLIAMS ONUS, a/k/a "CaHouse," the defendant, successfully gained unauthorized access to a Company user account, he changed the bank account information designated by the user of the account to receive the user's payroll to a prepaid debit card that was under ONUS's control. As a result, for a compromised Company user account, the user's payroll that was to be automatically deposited into the user's bank account was fraudulently diverted to a prepaid debit card under ONUS's control.

4. From at least in or about July 2017 through at least in or about 2018, at least approximately 5,500 Company user accounts were compromised and more than approximately \$800,000 in payroll funds were fraudulently diverted to prepaid debit cards, including those under the control of CHARLES WILLIAMS ONUS, a/k/a "CaHouse," the defendant. The compromised Company

user accounts were associated with employers whose payroll was processed by the Company, including employers located in the Southern District of New York.

STATUTORY ALLEGATIONS

5. From at least in or about July 2017 through at least in or about 2018, in the Southern District of New York and elsewhere, CHARLES WILLIAMS ONUS, a/k/a "CaHouse," the defendant, knowingly caused the transmission of a program, information, code, and command, and as a result of such conduct, intentionally caused damage without authorization to a protected computer, which caused loss to one and more persons during a one-year period aggregating at least \$5,000 in value, to wit, ONUS obtained unauthorized access to online accounts of Company users ("Victim Accounts") and modified the bank account information designated to receive the users' payroll, which impaired the integrity of the Victim Accounts, and caused over \$5,000 in loss.

(Title 18, United States Code, Sections 1030(a)(5)(A), 1030(c)(4)(A)(i)(I), 1030(c)(4)(B)(i), and 2.)

COUNT TWO

(Computer Fraud - Unauthorized Access to a Protected Computer To Further Intended Fraud)

The Grand Jury further charges:

6. The allegations contained in paragraphs 1 through 4 of this Indictment are repeated and realleged as if fully set forth herein.

7. From at least in or about July 2017 through at least in or about 2018, in the Southern District of New York and elsewhere, CHARLES WILLIAMS ONUS, a/k/a "CaHouse," the defendant, knowingly and with the intent to defraud accessed a protected computer without authorization, and exceeded authorized access, and by means of such conduct furthered the intended fraud and obtained things of value totaling more than \$5,000 during a one-year period, to wit, ONUS obtained unauthorized access to Victim Accounts and modified the bank account information designated to receive the users' payroll in order to fraudulently divert the payroll to prepaid debit cards under ONUS's control.

(Title 18, United States Code, Sections 1030(a)(4),
1030(c)(3)(A), and 2.)

COUNT THREE

(Wire Fraud)

The Grand Jury further charges:

8. The allegations contained in paragraphs 1 through 4 of this Indictment are repeated and realleged as if fully set forth herein.

9. From at least in or about July 2017 through at least in or about 2018, in the Southern District of New York and elsewhere, CHARLES WILLIAMS ONUS, a/k/a "CaHouse," the defendant, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, knowingly did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, ONUS obtained unauthorized access to Victim Accounts and modified the bank account information designated to receive the users' payroll in order to fraudulently divert payroll deposits originating, at least in part, in the Southern District of New

York, via wire transfers to prepaid debit cards under ONUS's control.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT FOUR

(Receipt of Stolen Money)

The Grand Jury further charges:

10. The allegations contained in paragraphs 1 through 4 of this Indictment are repeated and realleged as if fully set forth herein.

11. From at least in or about July 2017 through at least in or about 2018, in the Southern District of New York and elsewhere, CHARLES WILLIAMS ONUS, a/k/a "CaHouse," the defendant, received, possessed, concealed, stored, bartered, sold, and disposed of goods, wares, merchandise, securities, and money, of the value of \$5,000 and more, which had crossed a State or United States boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken, to wit, ONUS received, possessed, and used fraudulently diverted payroll deposits that were transferred in interstate and foreign commerce to prepaid debit cards under ONUS's control.

(Title 18, United States Code, Sections 2315 and 2.)

COUNT FIVE

(Aggravated Identity Theft)

The Grand Jury further charges:

12. The allegations contained in paragraphs 1 through 4 of this Indictment are repeated and realleged as if fully set forth herein.

13. From at least in or about July 2017 through at least in or about 2018, CHARLES WILLIAMS ONUS, a/k/a "CaHouse," the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), and aided and abetted the same, to wit, ONUS possessed and used, and aided and abetted the possession and use of, login credentials including usernames and passwords of various individual Company users during and in relation to the computer fraud and wire fraud offenses charged in Counts One through Three of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1) & (b) and 2.)

FORFEITURE ALLEGATIONS

14. As a result of committing the offenses alleged in Counts One and Two of this Indictment, CHARLES WILLIAMS ONUS, a/k/a "CaHouse," the defendant, shall forfeit to the United

States, pursuant to Title 18, United States Code, Section 1030(i), any and all property, real and personal, constituting or derived from, any proceeds obtained directly or indirectly, as a result of said offenses, and any and all personal property that was used or intended to be used to commit or to facilitate the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

15. As a result of committing the offense alleged in Counts Three and Four of this Indictment, CHARLES WILLIAMS ONUS, a/k/a "CaHouse," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

Substitute Assets Provision

16. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

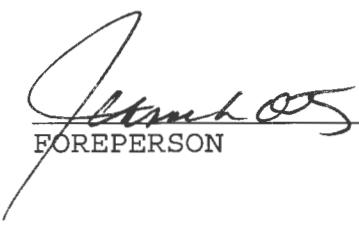
c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 1030; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



FOREPERSON



GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- V. -

CHARLES WILLIAMS ONUS,
a/k/a "CaHouse,"

Defendant.

SEALED INDICTMENT

19 Cr.

(18 U.S.C. §§ 1028A(a)(1) & (b),
1030(a)(4) & (5)(A), 1030(c)(3)(A),
1030(c)(4)(A)(i)(I) & (B)(i), 1343, 2315
and 2.)

GEOFFREY S. BERMAN
United States Attorney.

TRUE BILL

FOREPERSON

SA/19

Filed Sealed Indictment

Filed True Bill

Fired Arrest Warrant

Wang, USM